

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**TASHIA TAYLOR,**

**Plaintiff,**

**v.**

**RIVERSIDE BEHAVIORAL HEALTH,**

**MIKE KISTLER, and**

**MARGARET KOCH,**

**Defendants.**

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**Case No. 10-cv-243 TCK FHM**

**Judge Terence Kern**

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**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

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Pursuant to FED. R. CIV. P. 56, Defendants Riverside Behavioral Health, Mike Kistler and Margaret Koch ("Defendants") move the Court to enter Summary Judgment dismissing Plaintiff's lawsuit, which alleges discrimination based on her race and gender and retaliation in violation of Title VII of the Civil Rights Act of 1964.

Plaintiff's discrimination claims should be dismissed because she is unable to identify a similarly situated individual who was treated more favorably. Plaintiff's retaliation claims fail because there was no causal connection between any alleged protected activity and an adverse employment action. Plaintiff is further unable to establish a genuine issue of material fact that Defendants' legitimate nondiscriminatory reasons for terminating her employment, namely the multiple allegations of patient abuse against her, were pretextual.

In support of this Motion, Defendants rely upon their contemporaneously filed Memorandum in Support of Defendants' Motion for Summary Judgment and the following exhibits, attached thereto:

Exhibit 1      Relevant portions of the Deposition of Plaintiff Tashia Taylor and exhibits thereto.

Exhibit 2      Declaration of Jordan Cooke and exhibits thereto.

/s/ Tyson D. Schwerdtfeger

Tyson D. Schwerdtfeger, OBA No. 19566

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***Attorneys for Riverside Behavioral Health, Mike  
Kistler, and Margaret Koch***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served via U.S. Mail, postage prepaid, to:

Tashia Taylor  
10804 E. 15<sup>th</sup> Street  
Tulsa, OK 74128

on December 15, 2010.

/s/ Tyson D. Schwerdtfeger